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Attorneys for Specially Appearing
Defendants, RAGER, BELL, DOSKOCIL,
AND MEYER aka RBDM RAGER
MEYER AND RAGER MEYER
ACCOUNTANCY CORPORATION;
ROSSI DOSKOCIL & FINKELSTEIN,
LLP; and BRAD DOSKOCIL, CPA

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

STEVEN NERAYOFF and SN
LAGUARDIA INVESTORS, INC.

Plaintiffs,

vs.

RAGER, BELL, DOSKOCIL, AND
MEYER aka RBDM RAGER
MEYER AND RAGER MEYER
ACCOUNTANCY CORPORATION;
ROSSI DOSKOCIL &
FINKELSTEIN, LLP; and BRAD
DOSKOCIL,

Defendants.

Case No.: CV11-00386 (PSG)

**JOINT STIPULATED REQUEST
FOR AN ORDER CONTINUING
CASE MANAGEMENT
CONFERENCE AND
DEFENDANTS' DEADLINE TO
RESPOND TO COMPLAINT AND
[PROPOSED] ORDER**

COME NOW the parties, Plaintiff STEVEN NERAYOFF ("Nerayoff") and
Plaintiff SN LAGUARDIA INVESTORS, INC., a Delaware corporation ("SN" and
together with Nerayoff, "Plaintiffs") and specially appearing Defendants RAGER,
BELL, DOSKOCIL, AND MEYER aka RBDM RAGER MEYER AND RAGER
MEYER ACCOUNTANCY CORPORATION ("RBDM"); ROSSI DOSKOCIL &
FINKELSTEIN, LLP ("Rossi"); and BRAD DOSKOCIL ("Dorskocil" and together

1 with RBDM and Rossi, "Defendants") (Plaintiffs and Defendants are together
2 referred to as the "Parties"), by and through their counsel of record and as a
3 stipulation in the above referenced matter, state as follows:

4 1. Defendant RBDM was served with the Summons and Complaint in
5 this matter on or about March 11, 2011 and its response is due April 1, 2011.

6 2. Defendant Rossi was served with the Summons and Complaint in this
7 matter on or about March 11, 2011 and its response is due April 1, 2011.

8 3. Defendant Brad Doscocil, CPA was served with the Summons and
9 Complaint in this matter on or about March 11, 2011 and his response is due April
10 1, 2011.

11 4. Defendants specially appear before the Court in this Joint Stipulated
12 Request for the sole purpose stated herein and do not waive any objections that may
13 be asserted as to jurisdiction and/or venue. Further this Joint Stipulated Request is
14 entered into and the special appearance is made without any prejudice to
15 Defendants ability to bring a motion to dismiss this action and/or to bring a motion
16 for an Order transferring this action on the grounds that venue in the Northern
17 District is improper.

18 5. The Parties have informally discussed preliminary matters regarding
19 possible change of venue and tolling agreements, and believe that these matters
20 may be resolved by the Parties before an appearance is required by the Defendants.

21 6. Further investigation into the facts, circumstances, and issues in this
22 case merit an extension of time for Defendants to respond to the Complaint.

23 **STIPULATION**

24 IT IS HEREBY STIPULATED by and between the Parties and the Parties
25 hereby request the following:

26 1. The deadline for Defendants' response to the Complaint be extended
27 60 days pursuant to Federal Rules of Civil Procedure 6 and Civil Local Rule 6-2
28 from April 1, 2011 to May 31, 2011;

1 2. The meet and confer and filing deadline pursuant to Federal Rules of
2 Civil Procedure Rule 26(f) and ADR L.R. 3-5; Civil L.R. 16-8(b) and ADR L.R. 3-
3 5(b); and Civil L.R. 16-8(c) and ADR L.R. 3-5(b) and (c) be continued from April
4 5, 2011 to June 6, 2011;

5 3. The Rule 26(f) Report filing deadline pursuant to Federal Rules of
6 Civil Procedure Rule 26(a)(1) and Civil L.R. 16-9 be continued from April 19,
7 2011 to June 20, 2011;

8 4. The date of the Case Management Conference be continued from April
9 26, 2011 to June 27, 2011; and

10 5. Plaintiffs' reply to Defendants' response to the Complaint and to any
11 motions therein is due on July 1, 2011; and

12 6. Any other requirements under Rule 26 be similarly continued for 60
13 days.

14 DATED: March 31, 2011

CHAPMAN GLUCKSMAN DEAN
ROEB & BARGER
A Professional Corporation

17 By: /s/ Stephanie Sessions Perkins

18 **STEPHANIE SESSIONS PERKINS**
19 **REBECCA S. KEIM**

20 Attorneys for Specially Appearing
21 Defendants, RAGER, BELL, DOSKOCIL,
22 AND MEYER aka RBDM RAGER
23 MEYER AND RAGER MEYER
24 ACCOUNTANCY CORPORATION;
25 ROSSI DOSKOCIL & FINKELSTEIN,
26 LLP; and BRAD DOSKOCIL, CPA
27
28

1 DATED: March 31 , 2011

RICE & BRONITSKY

2
3 By: /s/ Paul E. Rice

PAUL E. RICE

4 Attorneys for Plaintiff, STEVEN
5 NERAYOFF and SN LAGUARDIA
6 INVESTORS, INC.
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PURSUANT TO STIPULATION, IT IS SO ORDERED:

DATED: _____, 2011

THE HONORABLE PAUL S. GREWAL
Judge of the United States District Court
For the Northern District of California